



Financial Year 2023-24 (1st April 2023 – 31st March 2024)

United Molasses Group Limited Modern Slavery and Human Trafficking Statement

Background

United Molasses Group Limited is a non-trading parent company of a group of businesses focused on the global trading and marketing of molasses and related products and the storage of bulk liquids (together the '**United Molasses Group**'/ '**the Group**'/ '**UMG**'). The Group's ultimate parent company is W&R Barnett Holdings Limited.

Section 54 of the United Kingdom's Modern Slavery Act 2015 ('the Act') encourages increased transparency within businesses and supply chains. Section 54(1) of the Act places a statutory obligation on commercial organisations, in any part of a group structure, that supply goods or services with an overall turnover of £36 million or more to produce a "slavery and human trafficking statement" for each financial year. Such an organisation has an obligation to produce a statement within 6 months of their financial year-end, indicating their position, policies and due diligence in relation to modern slavery and human trafficking.

This is our ninth year of producing Modern Slavery statements for entities within our group, with the most recent statements being prepared for signature on 26th September 2024 for the reporting period of 1st April 2023 – 31st March 2024. These statements are published in accordance with the Modern Slavery Act 2015 and set out the steps and measures taken by the United Molasses Group during the financial year 1st April 2023 – 31st March 2024 to seek to prevent modern slavery in its business and, to the greatest extent possible, in that of its supply chain.

Policy Statement

United Molasses Group Limited remains committed to ensuring that modern slavery and / or human trafficking does not occur within our business and, to the best of our ability, in our supply chain or in any part of our business that falls within the scope of the United Molasses Group audit sample. Our policies and our interaction with colleagues, as well as suppliers and customers, continues to reflect our commitment to acting ethically in all our operational matters. We continue to review our approach annually, striving to ensure that we act in compliance with the Modern Slavery Act 2015 and we continue to monitor such compliance.

Due Diligence

As part of our modern slavery due diligence, the past year has seen an increased focus on ensuring a coherent understanding of modern slavery legislation across the company. In addition, we are aware that each of the companies within the United Molasses Group that fall within the scope of the Modern Slavery Act 2015 have taken the following steps:

1. Undertaken a risk assessment of areas within their businesses and supply chain, with a particular focus on child labour, forced labour, health and safety, workers' rights, diversity and inclusion and the payment of the minimum wage in accordance with national standards. The risk areas were identified using the

latest data published on the [2023 Global Slavery Index](#) and the [List of Goods Produced by Child Labour or Forced Labour](#) produced by the Bureau of International Labor Affairs.

2. Taken steps to assess and manage the risks identified including:
 - i. Auditing their supply chain;
 - ii. Integrating management of the Modern Slavery Act 2015 into the Group's central ESG Committee to manage risks;
 - iii. Developing of the Group's internal online training package in relation to modern slavery and human trafficking by translating the training into all languages spoken across the UMG. Such training is now mandatory for all members of staff and is a part of the induction process for new start employees;
 - iv. Complying with their Slavery and Human Trafficking Statement;
 - v. Complying with the Group's Anti-Slavery and Human Trafficking policy; and
 - vi. Ensuring that modern slavery and the Group's response to such is a regular agenda item for each Board's consideration.

Assessing and managing risk

The United Molasses Group Limited acknowledges that the greatest risk of modern slavery occurring within the Group is via our supply chain. As such, each entity within the United Molasses Group that falls within the scope of the Modern Slavery Act 2015 is responsible for producing its own annual modern slavery statement and report and each company reports their own compliance to the United Molasses Group. This report is based upon their own internal audit and risk assessment of their business, which seeks iterative improvement year on year.

Effectiveness of our procedures

For the financial period 1st April 2023 – 31st March 2024, all companies within the United Molasses Group that are within the scope of the Modern Slavery Act 2015 have confirmed their compliance with section 54 of the Modern Slavery Act 2015 and have published statements in their own right.

Policies

We are committed to addressing modern slavery and ensuring ethical compliance and have developed policies that reflect the values that we adhere to as a business.

Our Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place in our business and supply chains. We also have the following policies in place relevant to modern slavery, which we continuously review and update:

- Environmental, Social and Governance ('ESG') Policy.
- Whistleblowing Policy.



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Training has been provided on the above policies and these are made available within our staff handbook which is readily available from Human Resources

The provision of these policies reinforces the need for effective systems and controls and seek to ensure, as far as possible, that modern slavery is not taking place anywhere within our own business. Relevant policies can also be made available to third parties on request.

Training

We have developed training for our staff on the issue of modern slavery and human trafficking within our business and supply chains and have delivered that training to the Senior Executive and Senior Management team already. We have also developed a new online training platform for our staff on the issue of modern slavery and in this financial year we have delivered that training to members of UMG. The purpose of this training is to ensure that our employees have an understanding of modern slavery which may occur in our business or supply chain and are equipped with the knowledge and confidence to identify risks and report concerns.

United Molasses Group Limited acknowledges our responsibilities in relation to ethical business activity and tackling modern slavery within our supply chain and business.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 in relation to the financial year and reporting period of 1st April 2023 – 31st March 2024. This statement was reviewed and approved by the Board of United Molasses Group Limited on 26th September 2024.

A handwritten signature in black ink, appearing to read 'Ben Macer'.

Ben Macer
Chief Executive Officer
United Molasses Group Limited
27th September 2024

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